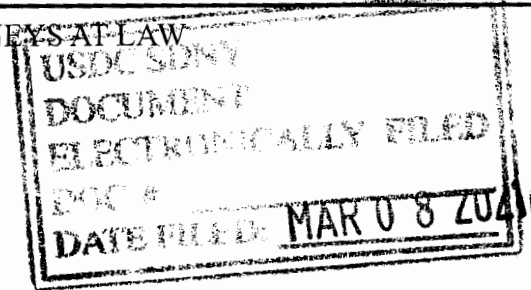


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March 5, 2021

SO ORDERED

VIA ECF

Hon. George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street, Room 1310
New York, New York 10007

The status conference is adjourned from
March 9, 2021 to April 27, 2021 at 9:30 a.m.

MAR 08 2021

George B. Daniels
HON. GEORGE B. DANIELS

Re: *Recarte et al v. Twenty-Three-One-Nought-W, LLC et al*
1:18-cv-08534-GBD
Request to Adjourn Conference

Dear Judge Daniels:

This firm represents the Defendants in the above-referenced action. Pursuant to Paragraph II(C) of Your Honor's Individual Practices, Defendants write on behalf of all parties to provide a status report and request that the status conference currently scheduled for Tuesday, March 9, 2021, be adjourned until Tuesday, May 4, 2021, or another time that is convenient for the Court.

The parties submit this status report and respectfully request an adjournment because the parties are addressing residual discovery deficiencies that do not require the Court's attention at this time and coordinating a non-party deposition. The Defendants have reviewed Plaintiff's proposed amended complaint and informed Plaintiff that they do not consent to its filing. The parties are discussing ESI-related production. The Defendants have asked Plaintiff to provide contact information for witnesses identified in his disclosures. Plaintiff is also determining whether he is willing to locate and schedule a nonparty that the Defendants intend to depose for a deposition.

No other scheduled dates will be affected by an adjournment. Thank you for Your Honor's consideration.

Respectfully submitted,
CLIFTON BUDD & DeMARIA, LLP
Attorneys for the Defendants

By:

A handwritten signature in black ink, appearing to read "Ian Paul".

Arthur J. Robb
Ian-Paul A. Poulos

cc: All Counsel of Record